

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Application Review

Issue Date:

Region: Winston-Salem Regional Office
County: Guilford
NC Facility ID: 4100268
Inspector's Name: Davis Murphy
Date of Last Inspection: 05/18/2016
Compliance Code: 3 / Compliance - inspection

Facility Data Applicant (Facility's Name): Plantation Pipe Line Company Facility Address: Plantation Pipe Line Company 6907-A West Market Street Greensboro, NC 27409 SIC: 4613 / Refined Petroleum Pipe Lines NAICS: 48691 / Pipeline Transportation of Refined Petroleum Products Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V				Permit Applicability (this application only) SIP: 15A NCAC 2Q .0513 (renewal) NSPS: N/A NESHAP: N/A PSD: N/A PSD Avoidance: N/A NC Toxics: N/A 112(r): N/A Other: N/A			
Contact Data				Application Data			
Facility Contact James Stamey Operations Manager (336) 547-3661 6907-A West Market Street Greensboro, NC 27409	Authorized Contact Richard Krejci Director - Operations (770) 751-4157 1000 Woodward Concourse, Suite 450 Alpharetta, GA 30005	Technical Contact Johnny Tapia Senior EHS Specialist (704) 249-9936 502 Tom Sadler Road Charlotte, NC 28214	Application Number: 4100268.15A Date Received: 05/15/2015 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 03980/T11 Existing Permit Issue Date: 03/15/2011 Existing Permit Expiration Date: 02/29/2016				
Total Actual emissions in TONS/YEAR:							
CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2014	---	---	207.26	---	---	6.74	1.42 [Toluene]
2013	---	---	290.49	---	---	9.27	1.94 [Toluene]
2012	---	---	295.25	---	---	8.58	1.95 [Toluene]
2011	---	---	263.42	---	---	7.65	1.69 [Toluene]
2010	---	---	156.22	---	---	3.95	0.9773 [Toluene]
Review Engineer: Richard Simpson Review Engineer's Signature: _____ Date: _____				Comments / Recommendations: Issue: 03980/T12 Permit Issue Date: November ##, 2016 Permit Expiration Date: October 31, 2021			

I. Purpose of Application

Plantation Pipe Line Company currently holds Title V Permit No. 0398T11 with an expiration date of February 29, 2016 for a breakout for gasoline and distillates located in Greensboro, Guilford County, North Carolina. The primary purpose of this application is for permit renewal without a modification. The renewal application was received on May 15, 2015, which was at least nine months prior to the expiration date, as required by General Permit Condition 3.K. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

II. Facility Description

The facility is a breakout station for the Plantation Pipe Line Company. Gasoline and distillate lines enter the site through two pipelines, one measuring 26" and the other 14" in diameter. Products are pumped into a tank farm at this site, and reintroduced into outgoing pipelines, one measuring 14" and the other 8" in diameter to be sent further down the pipeline or sent to nearby bulk gasoline terminals. After being stored on-site, the material can be pumped to bulk terminals where it can be shipped via tank trucks. The tanks that exclusively store distillate, kerosene, or transmix do not have any applicable requirements in the permit, but are still listed. A variety of exempt tanks are on site and used to store dyes, kerosene, and petroleum/water mixtures prior to processing

III. History/Background/Application Chronology

May 15, 2015 – Permit application **4100268.15A** was received for a Title V renewal.

September ##, 2016 – The facility, Winston-Salem Regional Office, and Stationary Compliance Section were requested by the Permitting Section to comment on the renewal. Comments were received and included in the permit.

October ##, 2016 – DRAFT permit sent to public notice and EPA for review prior to issuance. The 30-day public comment period ended **November ##, 2016** with the receipt of no comments. The 45-day EPA review period ended **November## 4, 2016** with the receipt of no comments.

IV. Permit Modifications/Changes and ESM Discussion

The following table describes the modifications to the current permit as part of the renewal process.

Page(s)	Section	Description of Change(s)
Cover and throughout	Throughout	Updated all tables, dates, and permit revision numbers.
Throughout	Throughout	Corrected the regulatory reference from 2D and 2Q to 02D and 02Q.
Attachment	Insignificant Activities List	Updated new DEQ web link for GACT and MACT sources.
3-4	Section 1	Included column for page numbers.
6	Section 2.1.B.g.	Changed wording from assure to ensure.
8	Section 2.1.D.1.f.ii.	Changed wording from assure to ensure.
11	Section 2.1.E.	Corrected Section 2.1.F. to 2.1.E.
12-21	General Conditions	Updated to latest version of DAQ shell version 4.0 12/17/15.

There were no changes made to the Title V Equipment Editor (TVEE) under this permit renewal.

V. Regulatory Review

The facility is currently subject to the following regulations:

15A NCAC 2D .0524, New Source Performance Standards (409 CFR 60, Subpart K)

15A NCAC 2D .0925, Petroleum Liquid Storage in Fixed Roof Tanks

15A NCAC 2D .0927, Bulk Gasoline Terminals

15A NCAC 2D .0933, Petroleum Liquid Storage in External Floating Roof Tanks

15A NCAC 2D .1111, Maximum Achievable Control Technology (40 CFR 63, Subpart R)

15A NCAC 2D .1111, Maximum Achievable Control Technology (40 CFR 63, Subpart ZZZZ)

15A NCAC 2D .1806, Control and Prohibition of Odorous Emissions

From Plantation Pipe Line Manual

Plantation Pipe Line Product Code	Description
53	Aviation Kerosene,
57	Aviation Kerosene, low sulfur
86	High Sulfur NRLM Diesel Fuel,
88	Heating Oil,
76	NRLM Diesel Fuel 500 ultra low sulfur

There were no changes made to the applicable regulations under this permit renewal.

VI. NSPS, NESHAPS/MACT, PSD, 112(r), CAM

NSPS – The Permittee is currently subject to the New Source Performance Standards for three of its existing storage tanks (**ID Nos. GN153 through GN155**). Based on NSPS 40 CFR 60 K, the Permittee is required to equip these tanks with an internal floating type cover per 40 CFR 112(a) as well as the monitoring and recordkeeping activities per 40 CFR 60.113. This permit renewal does not affect this status.

NESHAPS/MACT/112i – The Permittee is currently subject to the Maximum Achievable Control Technology Standards 40 CFR 63 Subpart R for its existing storage tanks in gasoline service. The permit currently includes references to the requirements in each of the paragraphs of this Subpart.

1. 15A NCAC 2D .1111: MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY

MACT Subpart R

- Plantation Pipe Line Company is “an existing” affected source. The pump station operations at this facility shall comply with all requirements of 15A NCAC 2D .1111 “Maximum Achievable Control Technology” and 40 CFR Part 63 Subpart R “National Emission Standards for Gasoline Distribution Facilities.”
- For the purpose of this permit condition, the definitions and nomenclature contained in 40 CFR 63.421 shall apply.
- The Permittee shall comply with the requirements of 40 CFR 63, Subpart A “General Provisions,” in accordance to the applicability of Subpart A to such sources, as identified in Table 1 of 40 CFR 63, Subpart R.

MACT Subpart ZZZZ

The diesel-fired emergency fire pump generators (ID No. GN Fuel Farm and GN Gas Farm) are subject to the “NESHAP for Stationary Reciprocating Internal Combustion Engines, 40 CFR Part 63,” MACT Subpart ZZZZ. The engines are considered a new source under the MACT because they were constructed after June 12, 2006. Per 40 CFR 63.590(c)(4), a new spark ignition 4

stroke rich burn (4SRB) stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions complies with MACT Subpart ZZZZ by meeting the requirements for NSPS Subpart JJJJ. No further requirements apply for such engines under MACT Subpart ZZZZ.

There were no changes made to the applicable regulations under this permit renewal.

PSD – The Permittee is not currently subject to any Prevention of Significant Deterioration requirements. This permit renewal does not affect this status.

112(r) – The facility is not subject to Section 112(r) of the Clean Air Act requirements because it does not store any of the regulated substances in quantities above the thresholds in the Rule. This permit renewal does not affect this status.

CAM – 40 CFR 64 requires that a compliance assurance monitoring plan be developed for all equipment located at a major facility, that have pre-controlled emissions above the major source threshold, and use a control device to meet an applicable standard. There are no permitted control devices at this facility; therefore, CAM is not applicable.

VII. Facility Wide Air Toxics

The Permittee is not currently subject to any NC Air Toxics requirements. This permit renewal does not affect this status.

VIII. Facility Emissions Review

There is no change in Title V potential emissions for this renewal. Actual emissions from previous years are listed on Page 1.

IX. Compliance Status

DAQ has reviewed the compliance status of this facility. During the most recent inspection conducted on May 18, 2016, Davis Murphy of the WSRO indicated that the facility appeared to be in compliance with all applicable requirements.

Five year compliance history

The facility has not been sent any Notice of Violations and Deficiency in the last five years.

X. Public Notice/EPA and Affected State(s) Review

A thirty-day public notice period and a forty-five day EPA review period is required for the renewal of the Title V permit. A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant shall be provided to the EPA. Also pursuant to 02Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice is provided to the public under 02Q .0521 above.

EPA's 45 Day Review period

Ms. Heather Ceron (U.S. EPA, Region IV) was provided a PROPOSED permit for review on October ##, 2016. EPA 45-day review period ended on November ##, 2016. No comments were offered or received.

Public Notice

The 30-day public notice of the proposed permit was posted on the NCDAQ website on October ##, 2016. No comments were offered or received.

XI. Other Regulatory Considerations

- A P.E. seal is NOT required for this application.
- A zoning consistency determination is NOT required for this renewal.
- Since this application was a renewal with no modification, no emission increases were noted for the PSD increment tracking purposes.

XII. Recommendations

The permit renewal application for Plantation Pipe Line Company in Greensboro, Guilford County, North Carolina has been reviewed by DAQ to determine compliance with all procedures and requirements. DAQ has determined that this facility is complying or will achieve compliance, as specified in the permit, with all requirements that are applicable to the affected sources. The DAQ recommends the issuance of Air Permit No. 03980T12.